3.14 CULTURAL RESOURCES

Cultural properties or resources may include prehistoric or historic sites, districts, buildings, structures, or objects that are listed in, or eligible for listing in, the National Register of Historic Places. Artifacts, records, and material remains associated with these properties and traditional cultural properties, which include archaeological, traditional procurement, history or landmark, and religious sites, are also important resources. Several federal and state laws protect cultural resources, such as Section 106 of the National Historic Preservation Act (NHPA) and RCW chapters 27.44 and 27.53.

This section describes and summarizes archaeological and cultural resources within the BP Cherry Point Cogeneration Facility study area, identifies potential impacts on these resources, and suggests mitigation measures designed to limit those impacts. Information for this section was summarized from the BP Cherry Point Cogeneration Project Application for Site Certification (BP 2002), three cultural resource reports of surveys that include the project site (Appendix B; Stone 2002; Whiteman and *Sts'aStelQuyd* 2002), historical maps, and other background literature.

3.14.1 Existing Conditions

Introduction

The proposed cogeneration facility, its interface systems with the BP Cherry Point Refinery, electrical transmission system intertie connection, and wetland mitigation areas are located approximately 15 miles northwest of Bellingham, Whatcom County, Washington. The project site lies about 5 miles west of I-5 and 3 miles east of Point Whitehorn and the Strait of Georgia. The proposed upgrade to a section of the Custer/Intalco Transmission Line No. 2 extends east from the project site to the Custer substation adjacent to I-5. The proposed recycled wastewater pipeline would be located in the Alcoa Intalco Works facility about 1 mile south of the project site.

This section of the EIS summarizes the assessments for historic, archaeological, and traditional-use resources that were conducted within the Area of Potential Effect (APE) or the geographic area within which the proposed BP cogeneration project may affect cultural resources. The APE for cultural resources includes the approximate footprint of the cogeneration plant site, the refinery interface, the Bonneville electrical transmission system intertie, the Custer/Intalco Transmission Line No. 2, and other project components. The interface systems area, which is located inside the refinery boundary, comprises Access Road 2; water, natural gas, industrial and sanitary waste pipelines; and a segment of an elevated piperack. A proposed gas compressor station, power substations, steam and condensate piping, the remainder of the piperack assembly, Laydown Area 1-3, and detention pond 2 are additional components of the cogeneration interface with the refinery located within the refinery boundary. Other project components include a water pipeline modification at Alcoa Intalco Works, Access Road 3,

Laydown Area 4, and compensatory wetland mitigation areas. The cogeneration facility will be treated as a footprint, with no detailed discussion of impacts and mitigation of individual project elements or features. However, the remaining components of the project will be described in detail with a discussion of impacts and mitigation measures for each feature.

The Applicant contracted with the Lummi Nation for cultural investigations of the cogeneration facility footprint, refinery interface area including Access Road 2, Access Road 3, Laydown Areas 1-4, and a portion of the transmission system intertie line between transmission pads 1 and 2. The Lummi Nation subcontracted the work to BOAS, Inc., but provided tribal members as archaeological trainees. The Applicant also contracted with URS Corporation to conduct a cultural resources assessment of the approximately 5-mile-long section of the Custer/Intalco Transmission Line No. 2 located between the project site and the Custer substation. Native plant and archaeological surveys of the wetland mitigation areas will be conducted by BOAS, Inc. and the Lummi Nation, but have not yet been completed. Archaeological native plant surveys have not been conducted for Access Road 1, detention pond 2 and its discharge apron, the power substation located inside the refinery, the piperack assembly, the Alcoa water pipeline, and the remainder of the 0.8-mile-long transmission system intertie.

The archaeological survey associated with BOAS, Inc.'s study of the cogeneration facility and laydown areas recorded one previously unknown archaeological site (Whiteman and *Sts'aStelQuyd* 2002).

Applicable Historic Preservation Regulations

This section provides a list of pertinent federal and state statutes that require consideration of impacts on historic properties for projects with federal or state involvement. Collectively, these regulations and guidelines establish a comprehensive program for the identification, evaluation, and treatment of cultural resources.

The National Register of Historic Places was authorized by the NHPA of 1966 and is the nation's official list of historic properties worthy of preservation. Properties listed in the National Register include districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture, at a local, state, or national level of significance. Within the state of Washington, the Office of Archaeology and Historic Preservation (OAHP), under the direction of the State Historic Preservation Officer, administers the National Register program.

The following criteria are used in evaluating cultural properties that are more than 50 years old or that have achieved significance in the last 50 years for listing in the National Register (36 CFR 60.4):

- properties that are associated with events that have made a significant contribution to the broad patterns of our history; or

- properties that are associated with the lives of people significant in our past; or
- properties that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- properties that have yielded, or may be likely to yield, information important to prehistory or history.

As mandated by Section 106 of the NHPA, agencies are required to take into account the effects of their actions on historic properties and to allow the Advisory Council on Historic Preservation an opportunity to comment. Properties eligible for inclusion in the National Register are identified, and the effect of the undertaking on each historic property must be determined, either no effect or effect. If an effect is determined, measures to mitigate or reduce the effect are developed, agreed upon, and implemented.

The Archaeological and Historic Preservation Act (AHPA) of 1974, also known as the Archaeological Data Preservation or Moss-Bennett Act, directs agencies to report to the Secretary of the Interior if a project will cause the loss of significant scientific, prehistoric, historic, or archaeological data. The agency may request that the Department of the Interior conduct or assist with the salvage of these data. The AHPA is largely redundant to the NHPA, however, this act is used as the authority if an archaeological site is discovered after the completion of Section 106 of the NHPA review.

The American Indian Religious Freedom Act of 1978, as amended in 1996, requires agencies to consult with Indian tribes to determine if an undertaking may affect the practice of traditional religions and the places and physical paraphernalia needed for those practices.

The Native American Graves Protection and Repatriation Act (NAGPRA) of 1990 requires that federal agencies repatriate Indian ancestral human remains to tribes with cultural or genetic affiliation with such remains and funerary items.

Executive Orders (EOs) 13084 and 13175 establishes government-to-government relationships between Indian tribes and the federal government and its agencies. EO 13175, signed in 2000 and revoking the earlier EO 13084, requires that agencies have an accountable process for tribal officials to provide comment and input on regulatory policies that have tribal implications.

RCW Chapter 27.44 protects Indian burial sites, cairns, petroglyph (incised in stone) and pictograph (painted) markings, and historic graves on public and private land. The chapter further stipulates that persons knowingly removing, destroying, or defacing these resources will be charged with a Class C felony.

RCW Chapter 27.53 protects sites, objects, structures, artifacts, and locations of prehistoric or archaeological interest located in, on, or under the surface of any lands or waters owned or under

the control of the state of Washington or its counties, cities, or political subdivisions. Disturbing archaeological resources without an archaeological excavation permit is punishable as a Class C felony.

3.14.2 Cultural Context

Methods

Background archival research for the proposed project assisted in the evaluation of the National Register eligibility of resources that are 50 years or older located within the APE. URS conducted a record search and literature review at OAHP in Olympia, Washington. URS staff reviewed maps, site files, and Whatcom County survey report files to determine the presence or absence of previously recorded archaeological sites in the Custer/Intalco Transmission Line No. 2 corridor as well as the extent of previous archaeological survey coverage in the project vicinity. URS also reviewed General Land Office plats and patent records to assess historic land use patterns and the potential for early historic period sites or features in the project area.

The field survey for this portion of the proposed project occurred on January 23-24, 2003, and consisted of a pedestrian survey conducted at approximately 49-foot transect intervals within the 131-foot-wide corridor. URS field staff examined exposed cuts and banks, rodent spoil piles, and other soil exposures. To increase the amount of subsurface examined, URS also excavated 6-inch-diameter soil probes at periodic intervals along the corridor's length. Additional soil probes were placed at anticipated tower locations. The probes averaged approximately 16 to 23 inches below the ground surface, reaching groundwater as little as 4 to 6 inches below the ground surface in many of the probes. URS identified no historic or archaeological resources in the Custer/Intalco Transmission Line No. 2 survey corridor.

BOAS, Inc. conducted two studies for components of the project. A May 2002 assessment included an archaeological and native plant survey of most of Access Road 3 located south of the proposed cogeneration facility site. BOAS also surveyed a second access road located approximately 0.5 mile east of Access Road 3. The December 2002 BOAS study examined the proposed cogeneration facility site, the refinery interface area extending from Grandview Road south to the existing Ferndale natural gas metering station, the remainder of Access Road 3, and a transmission pad to be located at the junction of the transmission intertie line and Custer/Intalco Transmission Line No. 2. BOAS performed background research at OAHP, the University of Washington Library, Whatcom County Auditor's office, Western Washington University Library, Whatcom County Museum of History and Art, Bellingham Public Library, BP Cherry Point Refinery, and the BOAS, Inc. office library.

BOAS' two sets of archaeological field work began on July 18, 2001, and October 14, 2002. The pedestrian survey of the access roads used three transects spaced at approximately 3- to 5-foot intervals. BOAS excavated a single line of subsurface 20-by-20-inch shovel probes in the road corridor spaced at approximately 66 feet. Additional probes were placed beyond the corridor

centerline in areas of potential turns in the route. The shovel probes averaged approximately 20-23 inches below the ground surface. Bucket augers were used to extract sediments from greater depths than could be reached by a shovel in each probe, averaging approximately 27 inches below the ground surface. An approximately 0.6 $inch^3$ sample from every 12th probe was screened through 1/8-inch wire mesh. The pedestrian survey of the remainder of BOAS' assessment area used an approximately 98-foot transect interval for the laydown areas and an approximately 33-foot interval for the access roads and transmission line segment. Subsurface probing in the second BOAS survey followed the same protocols as the first, except that probes were placed at an approximately 98-foot interval and all sediments were screened through 1/4-inch wire mesh. The average depth of the probes was approximately 19 inches below the ground surface in Laydown Areas 1-3, approximately 16 inches in Laydown Area 4, approximately 17 inches in the northern portion of Access Road 3, approximately 19 inches at the cogeneration site, and approximately 21 inches in the transmission pad areas.

The Lummi Nation and BOAS conducted a native plant study during the first survey, but postponed the study for the second survey area until plants could be more readily identified in the spring and summer. During the first survey, the survey corridor was mowed and traditionally used plants were identified at 3.3-inch intervals on the periphery of the mowed areas between shovel probe locations. The Lummi plant surveyors identified several sensitive areas that were avoided during road construction under the supervision of archaeological and tribal monitoring staff.

Ground visibility in the URS study area was low due to the majority of the route crossing through pasture. Dense grass and blackberry thickets obscured ground visibility along the access road routes during BOAS' first assessment. Similar conditions existed prior to the second survey, but the cogeneration area was mowed prior to the pedestrian survey to increase visibility.

Prehistory

Descriptions of cultural change in Northwest Coast prehistory is based on changes in archaeological artifact assemblages, food and resource procurement, and settlement patterns over time within a regional environmental framework. The prehistoric record for Puget Sound is divided into three broad chronological periods: the Early Period (15,000–5,000 Before Present), the Middle Period (5,000-1,000 Before Present), and the Late Period (1,000-250 Before Present).

The Early Period is characterized by chipped stone assemblages attributable to fluted projectile point, leaf-shaped projectile point, and cobble tool traditions. Subsistence patterns exhibit a reliance upon inland hunting, supplemented with fishing and marine invertebrate procurement in riverine and coastal areas. Settlements were typically located on upland plateaus or river terraces, although coastal occupations may have been flooded because of seismic activity or changes in sea level related to glaciation (Carlson 1990; Kidd 1964; Nelson 1990).

The Middle Period represents a proliferation in tool diversity within regional assemblages. Notched stone projectile points were characterized by a decrease in size, and toolkits were supplemented with groundstone, bone, and antler industries. Subsistence practices showed an increased orientation toward marine and riverine habitats; shellfish, salmon, and sea mammals became more important resources; and shell middens appeared in the archaeological record. Occupation areas expanded to include modern shorelines and islands and the earliest evidence of seasonal village sites dates to this period (Carlson 1990; Kidd 1964; Nelson 1990).

The Late Period is characterized by assemblages containing exotic trade goods imported from indigenous populations in the Columbia Plateau as well as metal arrowheads and trade beads from Euro-American groups. Small side-notched and triangular stone projectile points persisted but were superceded by an emphasis on bone and antler tools. Salmon became a major staple as evidenced by elaborate fish traps; subsistence practices were supplemented by terrestrial hunting and plant procurement. Permanent, village sites described by Euro-American settlers and ethnographers were established and persisted into the historic period (Carlson 1990; Kidd 1964; Nelson 1990).

Ethnohistory

During late historic times, Central Coast Salish Indians occupied the northern Puget Sound area. Three linguistic subdivisions of Central Salish occur in the vicinity of Cherry Point. Halkomelem speakers lived north of Birch Point and along the lower Fraser River valley. Nooksack speakers lived in inland sections of the Nooksack River drainage, and North Straits' speakers occupied the coastal areas north of Anacortes as well as the San Juan and other islands in the southern section of the Strait of Georgia. The BP Cherry Point Cogeneration project is situated in an area ceded by the Lummi, Nooksack, and Samish Indians; these groups now comprise the Lummi Indian Nation (Ruby and Brown 1986; Suttles 1990; Thompson and Kinkade 1990).

The Lummi are thought to have derived their name from *Lkungen,* the name that the North Straits-speaking Songish of Vancouver Island called themselves. The Lummi occupied coastal areas surrounding the mouth of the Nooksack River as well as several islands in Puget Sound. The Nooksack, meaning "mountain men," lived in the Nooksack River drainage. The Samish occupied additional islands in Puget Sound, including one that now bears their name as well as Guemes and Fidalgo islands (Ruby and Brown 1986; Suttles 1990; Swanton 1978).

The focus of the Central Coast Salish yearly cycle was the permanent winter village, which consisted of one or more cedar plank longhouses in which several families resided. The Central Coast Salish traded resources with other groups during the fall, and tool maintenance, basket and blanket weaving, woodcarving, and storytelling occurred during the winter in the villages. The houses measured between 20 and 60 feet in width and 40 and 120 feet in length and were built parallel to the shore. Each house featured wall and shed roof planks that were removable in fair weather. Principal villages near the project vicinity include *Sce'wex* on Birch Bay, *S'ilec* and *Ta'telew* on Semiahmoo Bay, and *Elek* and *Sxwelisen* on Bellingham Bay. The name for Cherry

Point, *Xwechi'exen,* derives from the word for "weasel" in the Lummi language. Lake Terrell is also known as *Xwhal le man* and refers to twined-rope reef net materials gathered in its vicinity (Stone 2002; Suttles 1990; Swanton 1978).

Subsistence revolved around seasonal harvests of marine and terrestrial foods that were eaten fresh or dried and stored for winter use. Salmon, halibut, herring, lingcod, and flounder were caught with reef nets, hook-and-line, and spears. The Central Coast Salish men used pitfalls, snares, bow and arrow, and nets to hunt deer, elk, bear, and over 30 species of waterfowl. Women gathered clams, mussels, herring eggs, crabs, sea urchins, and barnacles along the coast. Indian people also harvested many varieties of roots, berries, and other fruits (BP 2002; Suttles 1990). The Central Coast Salish used western yarrow, creambush oceanspray, western red cedar, swordfern, salal, skunk cabbage, and vine maple for pharmaceutical, technological, and ceremonial use (Moerman 1999; Suttles 1990). In the project vicinity, people mined the Cherry Point shoreline for stone to use as anchors, sinkers, other weights, and for hammers and mauls. The Lummi people continue to maintain their usual and accustomed use of the resources in the project vicinity for traditional purposes (BP 2002).

The arrival of Euro-Americans was presaged by outbreaks of epidemics that decimated native populations. Euro-American fur traders were followed by incursions of missionaries and settlers who dislocated native groups. Alcohol, disease, and relocation disrupted social and political organization (Suttles 1990).

Between 1854 and 1855, Isaac Stevens, the first governor of Washington Territory, compelled the Lummi and other Puget Sound Indians to relocate to reservations. Under the Point Elliot Treaty of 1855, the Lummi were sent to the Lummi Reservation that included one of their principal village locations. However, the territorial government expected them to share it with the Nooksack and Samish. Most tribal members found work in local Euro-American mills, canneries, and mines. A court decision in 1897 awarded Euro-Americans rights to the Lummi Indian Nation's ancestral fishing grounds that were not reversed until 1974 (Ruby and Brown 1986; Suttles 1990).

History

Although Russian, Spanish, and British naval expeditions are thought to have penetrated the coastal waters off Washington as early as the middle 1700s, British Captain George Vancouver's arrival in 1792 marks the earliest undisputed record of Euro-American contact in the Puget Sound region (Cole and Darling 1990; Kirk and Alexander 1990; Marino 1990).

Exploration was followed by incursions of Euro-American fur traders under the aegis of the Hudson's Bay Company during the 1830s. Early contacts between Euro-American traders and native populations proved disastrous to the latter as they fell victim to waves of malaria, tuberculosis, and smallpox epidemics in the late 1700s and middle 1800s (Cole and Darling 1990; Marino 1990; Suttles 1990).

In 1818, the Oregon Country, which included Washington State, was subject to both United States and British rule. By 1846, disputes over the area drew to a close when a treaty confirmed the international boundary line between Washington Territory and British Columbia (Kirk and Alexander 1990; Marino 1990).

A General Land Office (GLO) survey map made in 1859 shows no Euro-American development such as houses or roads in the project site (GLO 1859).

Agency and Tribal Consultation

Bonneville has contacted the Lummi Nation and consultation is ongoing. Documentation of the Section 106 consultation process will be included in a future version of this EIS once discussions have been completed.

Previous Cultural Investigations in the Project Vicinity

The University of Washington and Western Washington University conducted some of the earliest archaeological investigations in the Birch Bay area, beginning in the 1960s. Archaeologists recorded a shell midden site, three prehistoric sites that included fire-cracked rock and flaked stone artifacts, and two possible earth ovens all within one mile of the project site. These site locations ranged from coastal areas 25 to 100 feet above the beach to inland areas, including the Terrell Creek drainage (Bailey 1970; Grabert and Hall 1978; King 1990; Larsen 1969; Larsen and Osier 1969).

Investigations in the Cherry Point Industrial Park noted sparse deposits of flaked stone tools, stone tool manufacture debris, fire-cracked rock, and the remains of a historic house. Although these materials were determined not to be significant, the researchers recommended archaeological monitoring of construction activities in the area (Miss 1992; Rice 1992). A survey of the Ferndale pipeline, which included a segment along Grandview Road, did not uncover any cultural resources in the project site (Kusmer and Blukis Onat 1989). A second pipeline survey for a proposed Cascade Natural Gas line, which was located approximately 1,000 feet east of the project site, also did not record any cultural resources (Woodman and Mighetto 1992).

Eastern Washington University conducted a survey in 1995 within the BP Cherry Point Refinery for a substation and associated transmission corridor that cross the current project site. The survey noted poor ground visibility because of heavy vegetation cover and high groundwater levels that prevented subsurface investigations. Although their survey did not uncover cultural resources, the researchers concluded that the area had the potential to contain archaeological sites because of the number of recorded artifacts in the surrounding area (Luttrell 1995).

Results of Cultural Resource Studies for the Proposed Project

BOAS, Inc. conducted two archaeological surveys and the first of two native plant studies for the current project (Stone 2002; Whiteman and *Sts'aStelQuyd* 2002). The May 2002 work consisted of a pedestrian survey, subsurface probing, archaeological construction monitoring, and the native plant survey for the east and west access road areas. No cultural resources or buried archaeological deposits were recorded by the survey. Lummi Indian Nation elders identified several culturally important plants in the native plant survey, including horsetail, reed canarygrass, bracken fern, plantain, wild carrot, nettle, various berries, red willow, oceanspray, vine maple, alder, and several types of coniferous trees. BOAS and the Lummi Indian Nation anticipate finding similar plant resources in a subsequent plant survey of the project's wetland mitigation area and propose that the data be used in conjunction with restoration of native plant habitat in the wetland mitigation area. Wetland mitigation area plants will be studied before September 2003. The wetland mitigation area will be disced to reduce reed canarygrass cover and BOAS will survey the area for archaeological materials at that time (BP 2002; Stone 2002; Whiteman and *Sts'aStelQuyd* 2002).

The second BOAS survey covered the construction Laydown Areas, main cogeneration facility location, an additional access road, transmission tower pad location, and wetland mitigation area. Pedestrian survey and shovel probing of these areas identified one scatter of stone tools and stone flake debris. The materials were discovered between 4 and 12 inches below the ground surface. The site was recommended as insignificant (BP 2002; Whiteman and *Sts'aStelQuyd* 2002).

3.14.3 Impacts of the Proposed Action

Construction

Cogeneration Site

BOAS, Inc. recorded no cultural resources in this area. However, the Lummi Indian Nation's second native plant survey has not been completed. The results of this study may identify traditional resources in this area. An archaeological survey has not been conducted for the Access Road 1 area. Impacts on cultural resources in this area cannot be assessed until an evaluation has been made.

Refinery Interface

A BOAS, Inc. survey in 2002 recorded one archaeological site in Laydown Area 3 that appears to be insignificant and therefore ineligible for listing in the National Register. Because the site is not considered significant, the proposed project would not have any impacts on cultural resources. However, the Lummi Indian Nation's second native plant survey has not been completed. The results of this study may identify traditional resources in this area.

In addition, archaeological surveys have not been conducted for detention pond 2 and its discharge apron, the power substation located inside the refinery, industrial or sanitary wastewater pipelines, or the piperack assembly. Impacts on cultural resources in this area cannot be assessed until an evaluation has been made.

Transmission System

BOAS, Inc. recorded no cultural resources in the segment of this area that was surveyed. However, the Lummi Indian Nation's second native plant survey has not been completed. In addition, an archaeological survey has not been conducted for the remaining portion of the 0.8-mile-long transmission system intertie. The results of these studies may identify traditional resources or sites in this area.

Custer/Intalco Transmission Line No. 2

URS recorded no cultural resources in this area that would be affected by the lattice tower or monopole options. However, a native plant survey has not been conducted for this area. The results of this study may identify traditional resources in this area.

Other Components

Alcoa Water Pipeline

An archaeological survey has not been conducted for this area. Impacts on cultural resources in this area cannot be assessed until an evaluation has been made.

Access Road 3

BOAS, Inc. recorded no cultural resources in the Access Road 3 area. No impacts on cultural resources would result in this area.

Laydown Area 4

BOAS, Inc. recorded no cultural resources in this area. However, the Lummi Indian Nation's second native plant survey has not been completed. The results of this study may identify traditional resources in this area.

Wetland Mitigation Area

Archaeological surveys have not been conducted for the wetland mitigation area. In addition, the Lummi Indian Nation's second native plant survey has not been completed. The results of this study and its associated archaeological survey may identify traditional resources or sites in the

wetland mitigation area. Impacts on cultural resources in this area cannot be assessed until an evaluation has been made.

Operation

Operation of the project would not affect any cultural resources at any of the project components.

3.14.4 Impacts of No Action

Under the No Action Alternative, the cogeneration facility would not be constructed, and potential cultural resource impacts associated with the project would not occur.

3.14.5 Secondary and Cumulative Impacts

The BP Cherry Point Cogeneration Project and the GSX project may not spur further development within the refinery area. Construction for continued facility development, such as road building or transmission line construction, could affect archaeological deposits, tribal resources, and historic properties in currently undeveloped areas within the refinery complex. Specific locations where this development might occur, however, are unknown.

3.14.6 Mitigation Measures

Construction

Cogeneration Site, Refinery Interface, Transmission System, and Other Project Components

In the areas it surveyed, BOAS Inc. recommends that if intact archaeological resources or human burials are encountered during construction, then the construction foreman should immediately direct activities that could further disturb the deposits away from their vicinity. The construction foreman or the Applicant would then contact EFSEC, Dr. Robert G. Whitlam, Washington State Archaeologist, and Lummi Indian Nation cultural resource staff who would assist in determining how the materials should be treated. BOAS further recommends construction monitoring of the area within approximately 100 feet of the boundaries of the archaeological site discovered in Laydown Area 3.

In addition to the mitigation measures proposed by the Applicant, it is recommended that archaeological and native plant surveys be conducted for detention pond 2 and its discharge apron, the power substation located inside the refinery, industrial or sanitary wastewater pipelines, the piperack assembly, Alcoa water pipeline route, Access Road 3, and the wetland mitigation areas. If no significant archaeological resources are discovered or if they would not be affected by the project, construction of the proposed facility would not affect cultural resources

and no mitigation is necessary. If significant resources were found that would be affected by the project, however, appropriate mitigation measures should be devised before construction begins.

Custer/Intalco Transmission Line No. 2

URS recommends if intact archaeological resources or human burials are encountered during construction, that the construction foreman should immediately direct activities that could further disturb the deposits away from their vicinity. A qualified archaeologist should evaluate the find and determine an appropriate course of action.

Operation

Operation of the project would not affect any cultural resources, and no mitigation measures are required in this area.

3.14.7 Significant Unavoidable Adverse Impacts

Because cultural resources are not anticipated to be affected, no significant unavoidable adverse impacts on cultural resources would result from construction, operation, and maintenance of the proposed project.